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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 DESTINIE MULLEN, an Individual,

13 Plaintiff,

14 vs.

15 NUGENT, LLC, a Nevada limited liability
16 company d/b/a GREAT CLIPS, DOES I -X;
and ROE CORPORATIONS I -X.

17 Defendant.

CASE NO.: 2:19-cv-01109-GMN-GWF

STIPULATION AND ORDER
EXTEND REMAINING DISCOVERY
DEADLINES

(SECOND REQUEST)

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19 The parties, Plaintiff DESTINIE MULLEN (“**Plaintiff**”) and Defendant NUGENT,
20 LLC, a Nevada limited liability company d/b/a GREAT CLIPS (“**Defendant**”), by and through
21 their respective attorneys of record, hereby stipulate and agree as follows:

22 1. That the close of Discovery currently set for September 24, 2020, be extended
23 by a period of sixty (60) days, and become due on November 24, 2020 or as soon thereafter as
24 the Court may allow;

25 2. That all other discovery deadlines be extended sixty (60) days;

26 3. That the Parties exchanged Initial Disclosures and written discovery requests;
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1 4. That the Parties exchanged responses to the written discovery request;

2 5. That the Parties discussed Defendant amending their discovery responses and
3 amended responses are anticipated to be forthcoming shortly.

4 6. Plaintiff's counsel was recently informed that a member of Defendant's law firm
5 has been diagnosed as having the Novel Coronavirus, which has necessitated Defendant's firm
6 to take precautionary measures. It is anticipated that the affected person will likely be unable to
7 work for at least 30 days. In turn, this has resulted in the necessity for additional time for case
8 handling, and
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10 7. That Plaintiff's counsel and Defendants' counsel have been in contact regarding
11 the suitability of extending discovery in this matter based upon the limitations imposed on all
12 counsel and parties due to COVID-19 pandemic resurging as well as delays in amending
13 discovery responses, which are needed before any meaningful depositions can take place. Both
14 Plaintiff's and Defendant's counsel agree that an extension of the remaining discovery
15 deadlines is warranted for this matter to be fully litigated on the merits and an extension is in
16 the best interests of both the Parties and the Court;
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18 8. That the Parties have the following depositions outstanding: Plaintiff and Person
19 Most Knowledgeable for Defendant. The Parties have not taken those depositions because the
20 Parties would prefer to complete the exchange of written discovery before taking depositions.
21 Without a complete exchange of written discovery, the deposition will not be as meaningful.
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23 9. The parties are hopeful that with the additional time, that a resolution may be
24 reached after the amended responses are provided.

25 10. That good cause exists for the request for the Discovery deadline to be extended
26 until November 24, 2020 for the above-specified reasons.
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1 11. All parties believe the requested extension is warranted under the current
2 circumstances and will not result in undue delay in the administration of this cause.

3 12. This is the second request for an extension of the Scheduling Order in this matter
4 and is made in compliance with Local Rule 26.3.

5
6 Dated this 13th day of August, 2020.

Dated this 13th day of August, 2020.

7 **HKM Employment Attorneys LLP**

TCM Law Firm

8
9 /s/ Jenny L. Foley

/s/ Thomas C. Michaelides

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Attorney for Plaintiff

Attorney for Defendant

13
14 **ORDER**

15 IT IS SO ORDERED:

16 
UNITED STATES MAGISTRATE JUDGE

17 DATED: August 13, 2020
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